

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Brunner Engineering & Manufacturing
800-900 X Street
Bedford, Indiana 47421**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T093-7549-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal pressure vessels manufacturing plant.

Responsible Official:	Darryl Zupancic
Source Address:	800-900 X Street, Bedford, IN 47421
Mailing Address:	800-900 X Street, Bedford, IN 47421
Phone Number:	(812) 275-5931
SIC Code:	3443
County Location:	Lawrence
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of 968 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (b) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of 968 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (c) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of 911 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and
- (d) One (1) natural gas fired drying chamber, identified as D1, with maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booths B1 and B2, with emissions exhausting to stack D01.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) furnace at 660 thousand Btu per hour,
 - (2) one (1) furnace at 6.6 million Btu per hour,
 - (3) one (1) furnace at 80 thousand Btu per hour ,

- (4) one (1) furnace at 65 thousand Btu per hour,
 - (5) one (1) furnace at 85 thousand Btu per hour,
 - (6) one (1) furnace at 120 thousand Btu per hour;
 - (7) one (1) furnace at 120 thousand Btu per hour,
 - (8) one (1) furnace at 120 thousand Btu per hour;
 - (9) one (1) water heater at 40 thousand Btu per hour, and
 - (10) one (1) water heater at 1 million Btu per hour;
- (b) Combustion source flame safety purging on startup;
 - (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
 - (d) Machining where an aqueous cutting coolant continuously floods the machining interface;
 - (e) Degreasing operations performed with an aqueous-based phosphate cleaner;
 - (f) The following equipment related to manufacturing activities resulting in the emission of HAPs below insignificant emission levels: brazing equipment, cutting torches, soldering equipment, welding equipment;
 - (g) Process vessel degassing and cleaning to prepare internal repairs;
 - (h) Paved and unpaved roads and parking lots with public access;
 - (i) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
 - (j) Other categories with emissions below insignificant thresholds:
 - (1) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (2) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (3) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (4) one (1) fork lift operation utilizing multiple forklifts with PM-10 emissions less than twenty-five (25) pounds per day, and
 - (5) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1 Permit No Defense [IC 13]

- ## B.2 Definitions [326 IAC 2-7-1]

B.3 Permit Term [326 IAC 2-7-5(2)]

B.4 Enforceability [326 IAC 2-7-7]

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.6 Severability [326 IAC 2-7-5(5)]

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee is granted a permit shield as expressly provided by this Permit Condition. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (A) A brief description of the change within the source;
 - (B) The date on which the change will occur;
 - (C) Any change in emissions; and
 - (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of 968 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (b) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of 968 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (c) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of 911 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and
- (d) One (1) natural gas fired drying chamber, identified as D1, with maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booths B1 and B2, with emissions exhausting to stack D01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in each of the three (3) paint spray booths shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.
- (b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the three (3) paint booths (B1, B2 and #7) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) paint booths (B1, B2 and #7) are in operation.

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, the Permittee shall monitor the pressure drop across the dry filters twice per day when one or more of the paint booths are in operation. The pressure drop shall remain within the range established by the manufacturer's specifications.
- (b) The Permittee shall, on a weekly basis, monitor surface coating booth stacks C1, C2 and C4 for evidence of visible emissions while one or more of the booths are in operation. During this inspection, the Permittee shall also inspect the nearby ground for the presence of overspray.
- (c) The Permittee, shall, on a semiannual basis, monitor for the presence of overspray on the rooftops.
- (d) The Compliance Response Plan shall be followed whenever a condition exists that should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain a log of daily, weekly, and semiannual inspections. The Permittee shall maintain a log of pressure drop readings, and record the dates that dry filters are replaced. The pressure drop log shall indicate the base measurement for establishing the pressure drop range.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Brunner Engineering & Manufacturing
Source Address: 800-900 X Street, Bedford, Indiana 47421
Mailing Address: 800-900 X Street, Bedford, Indiana 47421
Part 70 Permit No.: 093-7549-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Brunner Engineering and Manufacturing
Source Address: 800-900 X Street, Bedford, Indiana 47421
Mailing Address: 800-900 X Street, Bedford, Indiana 47421
Part 70 Permit No.: 093-7549-00010

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Brunner Engineering & Manufacturing
Source Address: 800-900 X Street, Bedford, Indiana 47421
Mailing Address: 800-900 X Street, Bedford, Indiana 47421
Part 70 Permit No.: 093-7549-00010

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Brunner Engineering & Manufacturing
Source Location: 800-900 X Street, Bedford, IN 47421
SIC Code: 3443
County: Lawrence
Operation Permit No.: T093-7549-00010
Permit Reviewer: Nishat Hydari/EVP

On June 14, 2000, the Office of Air Management (OAM) had a notice published in the Times Mail, Bedford, Indiana, stating that Brunner Engineering & Manufacturing had applied for a Part 70 (Title V) Operating Permit to operate a metal pressure vessels manufacturing plant. The notice also stated that OAM proposed to issue a Title V for this operation and provided information on how the public could review the proposed Title V and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Title V should be issued as proposed.

On July 14, 2000, Terri Evans, Human Resources Manager at Brunner Engineering & Manufacturing submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Item A.2

The units of 'steel tanks' quoted for production rates is actually "square feet". The facility manufactures varying sizes and types of tanks daily. The only common unit which can be used to account for all coating activity is therefore, square feet of surface area. Due to the amount of surface area coated, the number was reduced by a factor of 100 for ease of calculation. Therefore, the "units per hour" in Item A.2 should read "968 square feet per hour." These units of '100 square feet' were used and noted on the Forms W-1 attached and those submitted previously for permitting purposes.

All other references throughout the draft permit and Technical Support Document (TSD) to "9.68 tanks per hour" should be changed to "968 square feet per hour." (as in Section D.1-Facility Description).

Response 1

The following changes have been made to Section A.2 and Section D.1-Facility Description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (b) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (c) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of ~~0-646~~ **911 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (b) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (c) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of ~~0-646~~ **911 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and
- (d) One (1) natural gas fired drying chamber, identified as D1, with maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booths B1 and B2, with emissions exhausting to stack D01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

The following revisions have been made to the Technical Support Document under the Permitted Emission Units and Pollution Control Equipment section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (2) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of ~~9-68~~ **968 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (3) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of ~~0-646~~ **911 square feet of** steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and

Comment 2

Item A.3(a)

The number and type of natural-gas fired units changed at the facility between the initial submittal of the Part 70 Application in December 1996 and the State Construction/Operating Permit Application submitted in June 1999. Brunner believes that the updated list submitted to IDEM in June 1999 may not have been incorporated in the subject draft Part 70 Operating Permit. A list of the current natural-gas fired units at the facility is attached. Brunner requests that the draft permit and the Technical Support Document be revised as necessary to reflect the units actually at the plant.

Response 2

The emissions from the natural gas fired units were re-calculated based on the revised data submitted and the revised calculation sheet (Page 5 of 5 of TSD Addendum App A) is attached.

The following changes have been made to Section A.3(a).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) furnace at 660 thousand Btu per hour,
 - (2) one (1) furnace at 6.6 million Btu per hour,
 - (3) one (1) furnace at 80 thousand Btu per hour ,
 - (4) one (1) furnace at 65 thousand Btu per hour,

- (5) one (1) furnace at 85 thousand Btu per hour,
- (6) one (1) furnace at 120 thousand Btu per hour;
- (7) one (1) furnace at 120 thousand Btu per hour,
- (8) one (1) furnace at 120 thousand Btu per hour;
- ~~(9) one (1) furnace at 120 thousand Btu per hour;~~
- (10) one (1) water heater at 40 thousand Btu per hour, and
- (11) one (1) water heater at 1 million Btu per hour;

The following revisions have been made to the Technical Support Document under the Insignificant Activities section to reflect the changes (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) furnace at 660 thousand Btu per hour,
 - (b) one (1) furnace at 6.6 million Btu per hour,
 - (c) one (1) furnace at 80 thousand Btu per hour ,
 - (d) one (1) furnace at 65 thousand Btu per hour,
 - (e) one (1) furnace at 85 thousand Btu per hour,
 - (f) one (1) furnace at 120 thousand Btu per hour;
 - (g) one (1) furnace at 120 thousand Btu per hour,
 - (h) one (1) furnace at 120 thousand Btu per hour;
 - ~~(i) one (1) furnace at 120 thousand Btu per hour;~~
 - (j) one (1) water heater at 40 thousand Btu per hour, and
 - (k) one (1) water heater at 1 million Btu per hour;

Comment 3

Item A.3(e)

Due to changes in production materials, the facility believes that this activity no longer applies to the plant and should be deleted from the draft permit and TSD. Degreasing is only performed with an aqueous-based phosphate cleaner.

Response 3

The condition will not be deleted from the permit, rather it will be updated to specify that an aqueous-based phosphate cleaner is used. The following changes have been made to Section A.3(e).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (e) Degreasing operations ~~that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;~~ **performed with an aqueous-based phosphate cleaner;**

The following revisions have also been made to the Technical Support Document under the Insignificant Activities section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Insignificant Activities

- (5) Degreasing operations ~~that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;~~ **performed with an aqueous-based phosphate cleaner;**

Comment 4

Item A.3(f)

The facility questions whether this description is strictly accurate. Soldering and welding operations may result in some levels of HAPs becoming airborne depending on the materials being used. However, the total emissions from these activities have been determined to be well below Insignificant levels. Emissions of potential HAPs from such operations were reported on GSD Form 10, and Brunner believes that this description should be removed from this section and from the TSD, and would be more appropriately included in Section (k).

Response 4

The condition will not be deleted from the permit, rather it will be updated to specify that HAP emissions are below insignificant levels. The following changes have been made to Section A.3(f).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- (f) The following equipment related to manufacturing activities ~~not~~ resulting in the emission of HAPs **below insignificant emission levels:** brazing equipment, cutting torches, soldering equipment, welding equipment;

The following revisions have also been made to the Technical Support Document under the Insignificant Activities section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Insignificant Activities

- (6) The following equipment related to manufacturing activities ~~not~~ resulting in the emission of HAPs **below insignificant emission levels**: brazing equipment, cutting torches, soldering equipment, welding equipment;

Comment 5

Item A.3(j)

The facility believes that this description, (taken from #45 Insignificant Activities List, Form GSD-10(a)) would be more accurately described in Section (k) - "Other categories with emissions below insignificant thresholds" and requests that this item as written be deleted from the draft permit and the TSD. The facility has identified its Insignificant Emissions from cutting, grinding, and welding as a separate category on Form GSD-10.

Response 5

Since the facility has identified its Insignificant Emissions from cutting, grinding, and welding in Section A.3(k), Section A.3(j) and Section D.2 will be deleted. The following changes have been made to Section A.3 and Section D.2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- ~~(j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;~~
- (kj) Other categories with emissions below insignificant thresholds:
- (1) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (2) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (3) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (4) one (1) fork lift operation with PM-10 emissions less than twenty-five (25) pounds per day, and
 - (5) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

~~SECTION D.2~~ **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

- (a) ~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

~~Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding and machining operation shall not exceed allowable PM emission rate based on the following equation:~~

~~Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:~~

$$\text{E} = 4.10 \text{ P}^{0.67} \quad \text{where E = rate of emission in pounds per hour; and} \\ \text{P} = \text{process weight rate in tons per hour}$$

The following revisions have also been made to the Technical Support Document under the Insignificant Activities section (**bolded** language has been added, the language with a line through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Insignificant Activities

- (10) ~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;~~

- (140) Other categories with emissions below insignificant thresholds:
- (a) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (b) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (c) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (d) one (1) fork lift operation with PM-10 emissions less than twenty-five (25) pounds per day, and

- (e) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

Comment 6

Item A.3(k)(4)

It is unclear if the description means 'one' forklift, or if it refers to 'one forklift operation' in which multiple forklifts are used. Brunner would like to clarify that multiple forklifts are operated at the facility, and request that, if necessary, the descriptions in the draft permit and the TSD be modified to reflect this.

Response 6

The following changes have been made to Section A.3(k)(4).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (k) Other categories with emissions below insignificant thresholds:
 - (1) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (2) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (3) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (4) one (1) fork lift operation **utilizing multiple forklifts** with PM-10 emissions less than twenty-five (25) pounds per day, and
 - (5) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

The following revisions have also been made to the Technical Support Document under the Insignificant Activities section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Insignificant Activities

- (11) Other categories with emissions below insignificant thresholds:
 - (a) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (b) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (c) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (d) one (1) fork lift operation **utilizing multiple forklifts** with PM-10 emissions less than twenty-five (25) pounds per day, and

- (e) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

Comment 7

Condition B.14 - Permit Shield

Brunner requests that the first sentence of this condition be revised to read: (a) Pursuant to 346 IAC 2-7-15, the Permittee is granted a permit shield as expressly provided by this Permit Condition B.14.

Response 7

The following changes have been made to Condition B.14(a).

B.14 Permit Shield [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee ~~has been~~ **is** granted a permit shield **as expressly provided by this Permit Condition**. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

Comment 8

Condition C.15 - Compliance Monitoring Plan

Brunner requests that paragraph (a)(5) of this condition be revised to provide one hundred twenty (120) days for preparation of the Compliance Response Plan.

Response 8

The Compliance Response Plan (CRP) requirement of response steps and schedule requirements is one example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. IDEM, OAM feels that 90 days is sufficient for the preparation of the CRP. No changes have been made to the permit as a result of this comment.

Comment 9

Item D.1.5

Brunner understands the necessity to comply with the VOC Emission Limitations and Standards described in Section D.1.1, but would like to request that the requirement to demonstrate compliance be based on maintenance of MSDS and VOC Data Sheet information in conjunction with the paint usage records required by Section D.1.8.

Brunner does not add solvents to their coating prior to application, or use solvents for gun-flushing and clean-up. All paints delivered to the applicator are exactly as AS SUPPLIED by the coatings manufacturers. Therefore the need to prepare and maintain a daily calculation of 30-day average usage of paints would not appear to provide any additional compliance assurance beyond the record-keeping requirements already specified in D.1.8. Brunner requests that Section D.1.5 be removed, since documentation to substantiate with Condition D.1.1 is already required in Section D.1.8.

Response 9

IDEM has determined that Section D.1.5 is not necessary for the source to show compliance with Section D.1.1, thus Section D.1.5 will be deleted. Section D.1.5 is being deleted because at this time, no additional solvents are added to the compliant coatings which are the only ones used. Should non-compliant coatings be used, or the addition of solvent to the coatings be done such that the VOC content would exceed the limits in 326 IAC 8-2-9, a significant permit modification would have to be requested by the source and approved by IDEM, OAM. This significant permit modification would be necessary to incorporate language for demonstration of compliance via 326 IAC 8-2-1 into the permit.

~~D.1.5 VOC Emissions~~

~~Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent month.~~

Comment 10

Condition D.1.7 - Monitoring

Brunner has objected to these same compliance monitoring conditions in an administrative appeal of a Source Modification issued to Brunner on or about November 22, 1999. Those objections are incorporated by reference in these comments to the draft Part 70 permit. Without limiting those objections in any way, Brunner particularly objects to the requirements for monthly rooftop inspections as unsafe and unnecessary.

Response 10

Brunner has accepted language to resolve its administrative appeal of a Source Modification issued on November 23, 1999. The following changes will be incorporated into the Title V permit under Condition D.1.7 (now re-numbered D.1.6).

~~D.1.76 Monitoring~~

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~weekly observations shall be made of the overspray from the surface coating booth stacks (C1, C2 and C4) while one or more of the booths are in operation~~ **the Permittee shall monitor the pressure drop across the dry filters twice per day when one or more of the paint booths are in operation. The pressure drop shall remain within the range established by the manufacturer's specifications. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

- ~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (b) The Permittee shall, on a weekly basis, monitor surface coating booth stacks C1, C2 and C4 for evidence of visible emissions while one or more of the booths are in operation. During this inspection, the Permittee shall also inspect the nearby ground for the presence of overspray.
- (c) The Permittee, shall, on a semiannual basis, monitor for the presence of overspray on the rooftops.
- (d) The Compliance Response Plan shall be followed whenever a condition exists that should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (ee) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 11

Condition D.1.8

This section should be revised consistent with D.1.7.

Response 11

Section D.1.8 (now re-numbered D.1.7) has been revised consistent with D.1.7 (now re-numbered D.1.6). It includes language Brunner has accepted to resolve its administrative appeal of a Source Modification issued on November 23, 1999.

Section D.1.7(a)(2) through Section D.1.7(a)(5) has been deleted because at this time, no additional solvents are added to the compliant coatings which are the only ones used. Should non-compliant coatings be used, or the addition of solvent to the coatings be done such that the VOC content would exceed the limits in 326 IAC 8-2-9, a significant permit modification would have to be requested by the source and approved by IDEM, OAM. This significant permit modification would be necessary to incorporate language for demonstration of compliance via 326 IAC 8-2-1 into the permit.

D.1.87 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through (5)~~ below. Records maintained for (1) ~~through (5)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) ~~The amount and VOC content of each coating material and solvent used.~~ Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) ~~A log of the dates of use;~~
 - (3) ~~The cleanup solvent usage for each month;~~
 - (4) ~~The total VOC usage for each month; and~~
 - (5) ~~The weight of VOCs emitted for each compliance period.~~
- (b) To document compliance with Conditions **D.1.5 and D.1.6** ~~D.1.7 and D.1.8~~, the Permittee shall maintain a log of ~~weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~ **daily, weekly, and semiannual inspections. The Permittee shall maintain a log of pressure drop readings, and record the dates that dry filters are replaced. The pressure drop log shall indicate the base measurement for establishing the pressure drop range.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 12

Emissions Calculations and Potentials to Emit
Technical Support Document pages 3-4, and Appendix A pages 1-3

It is Brunner's belief, based on their review of the data in the draft permit TSD, that the most recent information regarding facility operations submitted to IDEM in June 1999 may not have been incorporated into the emission calculations and potentials to emit for the draft Part 70 permit. In addition, Brunner has substituted some coatings with even lesser amounts of HAPs since June 1999 than those listed in the draft permit TSD.

In order to reflect the most current and accurate information about the facility, Brunner has prepared revised Form W-1s (attached) for coatings units Booth 1, Booth 2, and Line 7 and requests that this information be used to revise the TSD and Appendix A in all sections where applicable.

Response 12

The VOC emissions from the surface coating operation were re-calculated based on the revised W-1 forms submitted and the revised calculation sheet (Page 2 of 5 of TSD Addendum App A) is attached.

The HAP emissions from the surface coating operation were re-calculated based on the revised W-1 forms submitted and the revised calculation sheet (Page 3 of 5 of TSD Addendum App A) is attached.

A revised summary of calculations sheet (Page 1 of 5 of TSD Addendum App A) is attached.

The following revisions have been made to the Technical Support Document under the Potential to Emit section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	71.98 85.96
PM-10	72.25 86.23
SO ₂	0.02
VOC	64.04 53.14
CO	3.92 3.88
NO _x	4.34 4.25

HAP's	Potential To Emit (tons/year)
Ethyl Benzene	5.19
4-Methyl-2-Pentanone	5.19
Dimethyl Benzene	20.76
Glycol Ethers	51.94 12.98
TOTAL	51.94 44.12

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Brunner Engineering & Manufacturing
Source Location: 800-900 X Street, Bedford, IN 47421
County: Lawrence
SIC Code: 3443
Operation Permit No.: T093-7549-00010
Permit Reviewer: Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Brunner Engineering & Manufacturing relating to the operation of metal pressure vessels manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) paint spray booth, identified as B1, utilizing an airless and air-assisted airless system, coating a maximum of 9.68 steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C1;
- (2) One (1) paint spray booth, identified as B2, utilizing an airless and air-assisted airless system, coating a maximum of 9.68 steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C2;
- (3) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of 0.616 steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4; and
- (4) One (1) natural gas fired drying chamber, identified as D1, with maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booths B1 and B2, with emissions exhausting to stack D01.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) furnace at 660 thousand Btu per hour,
 - (b) one (1) furnace at 6.6 million Btu per hour,
 - (c) one (1) furnace at 80 thousand Btu per hour ,
 - (d) one (1) furnace at 65 thousand Btu per hour,
 - (e) one (1) furnace at 85 thousand Btu per hour,
 - (f) one (1) furnace at 120 thousand Btu per hour;
 - (g) one (1) furnace at 120 thousand Btu per hour,
 - (h) one (1) furnace at 120 thousand Btu per hour;
 - (i) one (1) furnace at 120 thousand Btu per hour;
 - (j) one (1) water heater at 40 thousand Btu per hour, and
 - (k) one (1) water heater at 1 million Btu per hour;
- (2) Combustion source flame safety purging on startup;
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (4) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (7) Process vessel degassing and cleaning to prepare internal repairs;
- (8) Paved and unpaved roads and parking lots with public access;
- (9) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (10) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
- (11) Other categories with emissions below insignificant thresholds:
 - (a) welding operations with PM-10 emission less than twenty-five (25) pounds per day,
 - (b) one (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (c) one (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day,
 - (d) one (1) fork lift operation with PM-10 emissions less than twenty-five (25) pounds per day, and
 - (e) aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 47-10-90-0092, issued on March 9, 1987;
- (2) CP 093-3407-00010, issued on October 27, 1994;
- (3) Exemption 093-10450-00010, issued on March 5, 1999; and
- (4) Significant Source Modification T093-11157-00010, issued on November 23, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

The source has the following enforcement actions pending:

- (1) For violating the limit of 3.5 pounds of VOCs per gallon of coating less water listed in rule 326 IAC 8-2-9 (Miscellaneous Metal Coatings).

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C1	Paint Booth (B1)	16	3	26,400	Ambient
C2	Paint Booth (B2)	16	3	26,400	Ambient
C4	Paint Booth (#7)	6	2	25,900	Ambient
D01	Drying Oven (D1)	16	3	1,720	less than 150

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional information was received on November 29, 1999.

A notice of completeness letter was mailed to the source on January 8, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	71.98
PM-10	72.25
SO ₂	0.02
VOC	64.01
CO	3.92
NO _x	4.31
HAP's	Potential To Emit (tons/year)
Glycol Ethers	51.94
TOTAL	51.94

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	51.03
PM-10	35.72
SO ₂	-
VOC	14.28
CO	-
NO _x	-
HAP (specify)	8.34 (xylene) 3.16 (toluene) 1.82 (ethylbenzene)

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lawrence County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.
- (c) The degreasing operation is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T) because it does not use any air regulated solvents in its degreasing operation.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 12, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is located in Lawrence County and the potential to emit any criteria pollutant is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths (B1, B2 and #7) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 8-3-2 (Cold Cleaner Operation)

The degreasing operation is not subject to this rule because it does not use organic solvents.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the surface coating facilities (B1, B2 and #7) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times when the three (3) paint booths (B1, B2 and #7) are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The paint spray booths (B1, B2 and #7) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (C1, C2 and C4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 3).

Conclusion

The operation of this metal pressure vessels manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T093-7549-00010**.

Appendix A: Emission Calculations

Company Name: Brunner Engineering & Manufacturing
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-7549
Plt ID: 093-00010
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Dryer	Surface Coating	TOTAL
PM	0.07	0.01	85.88	85.96
PM10	0.30	0.05	85.88	86.23
SO2	0.02	0.00	0.00	0.02
NOx	3.89	0.36	0.00	4.25
VOC	0.21	0.04	52.89	53.14
CO	3.27	0.61	0.00	3.88
total HAPs	0.00	0.00	44.12	44.12
worst case single HAP	0.00	0.00	20.76	20.76
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Dryer	Surface Coating	TOTAL
PM	0.07	0.01	85.88	85.96
PM10	0.30	0.05	85.88	86.23
SO2	0.02	0.00	0.00	0.02
NOx	3.89	0.36	0.00	4.25
VOC	0.21	0.04	52.89	53.14
CO	3.27	0.61	0.00	3.88
total HAPs	0.00	0.00	44.12	44.12
worst case single HAP	0.00	0.00	20.76	20.76
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations

Page 2 of 5 TSD Addendum App A

VOC and Particulate
From Surface Coating Operations

Company Name: Brunner Engineering & Manufacturing
 Address City IN Zip: 800-900 X Street, Bedford, IN 47421
 CP: 093-7549
 Plt ID: 093-00010
 Reviewer: Nishat Hydari / EVP

Material	Process ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SC8002 Grey	B1	9.82	53.69%	49.18%	4.5%	57.44%	36.81%	0.49360	9.680	1.04	0.44	2.12	50.79	9.27	23.79	1.20	75%
SB6002 Blue Enamel	B1	9.25	54.39%	49.23%	5.2%	54.68%	39.14%	0.49360	9.680	1.05	0.48	2.28	54.73	9.99	22.07	1.22	75%
SB8001 Grey Enamel	B1	9.62	53.06%	48.06%	5.0%	54.91%	38.85%	0.49360	9.680	1.07	0.48	2.30	55.16	10.07	23.63	1.24	75%
SB1001 White Enamel	B1	10.47	47.08%	42.56%	4.5%	52.45%	41.39%	0.49360	9.680	1.00	0.47	2.26	54.27	9.90	28.99	1.14	75%
SB9001 Black Enamel	B1	9.07	55.88%	50.67%	5.2%	55.18%	38.70%	0.49360	9.680	1.05	0.47	2.26	54.19	9.89	20.94	1.22	75%
SC2006 Red Primer	B1	9.8	53.25%	48.68%	4.6%	57.34%	36.86%	0.49360	9.680	1.05	0.45	2.14	51.36	9.37	23.97	1.22	75%
SC8002 Grey	B2	9.82	53.69%	49.18%	4.5%	57.44%	36.81%	0.49360	9.680	1.04	0.44	2.12	50.79	9.27	23.79	1.20	75%
SB6002 Blue Enamel	B2	9.25	54.39%	49.23%	5.2%	54.68%	39.14%	0.49360	9.680	1.05	0.48	2.28	54.73	9.99	22.07	1.22	75%
SB8001 Grey Enamel	B2	9.62	53.06%	48.06%	5.0%	54.91%	38.85%	0.49360	9.680	1.07	0.48	2.30	55.16	10.07	23.63	1.24	75%
SB1001 White Enamel	B2	10.47	47.08%	42.56%	4.5%	52.45%	41.39%	0.49360	9.680	1.00	0.47	2.26	54.27	9.90	28.99	1.14	75%
SB9001 Black Enamel	B2	9.07	55.88%	50.67%	5.2%	55.18%	38.70%	0.49360	9.680	1.05	0.47	2.26	54.19	9.89	20.94	1.22	75%
SC2006 Red Primer	B2	9.8	53.25%	48.68%	4.6%	57.34%	36.86%	0.49360	9.680	1.05	0.45	2.14	51.36	9.37	23.97	1.22	75%
SC8002 Grey	Pre-Paint B1	9.82	53.69%	49.18%	4.5%	57.44%	36.81%	0.05165	9.680	1.04	0.44	0.22	5.31	0.97	2.49	1.20	75%
SB6002 Blue Enamel	Pre-Paint B1	9.25	54.39%	49.23%	5.2%	54.68%	39.14%	0.05165	9.680	1.05	0.48	0.24	5.73	1.05	2.31	1.22	75%
SB8001 Grey Enamel	Pre-Paint B1	9.62	53.06%	48.06%	5.0%	54.91%	38.85%	0.05165	9.680	1.07	0.48	0.24	5.77	1.05	2.47	1.24	75%
SB1001 White Enamel	Pre-Paint B1	10.47	47.08%	42.56%	4.5%	52.45%	41.39%	0.05165	9.680	1.00	0.47	0.24	5.68	1.04	3.03	1.14	75%
SB9001 Black Enamel	Pre-Paint B1	9.07	55.88%	50.67%	5.2%	55.18%	38.70%	0.05165	9.680	1.05	0.47	0.24	5.67	1.03	2.19	1.22	75%
SC2006 Red Primer	Pre-Paint B1	9.8	53.25%	48.68%	4.6%	57.34%	36.86%	0.05165	9.680	1.05	0.45	0.22	5.37	0.98	2.51	1.22	75%
7GZ410 Grey	L7	13.15	24.17%	0.00%	24.2%	0.00%	57.14%	0.25000	9.110	3.18	3.18	7.24	173.73	31.71	24.87	5.56	75%
7GZ393 Grey Primer	L7	13.01	24.36%	0.00%	24.4%	0.00%	56.02%	0.25000	9.110	3.17	3.17	7.22	173.23	31.61	24.54	5.66	75%

State Potential Emissions

Add worst case coating to all solvents

12.08

289.82

52.89

85.88

Note: The coatings in each process are mutually exclusive

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations

HAP Emission Calculations

Page 3 of 5 TSD Addendum AppA

Company Name: Brunner Engineering & Manufacturing
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP#: 093-7549
Plt ID: 093-00010
Permit Reviewer: Nishat Hydari / EVP

Material	Process	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % 4-Methyl-2-Pentanone	Weight % Dimethyl Benzene	Weight % Glycol Ethers	Ethyl Benzene Emissions (ton/yr)	4-Methyl-2-Pentanone Emissions (ton/yr)	Dimethyl Benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
SC8002 Grey	B1	9.82	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.17
SB6002 Blue Enamel	B1	9.25	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	5.81
SB8001 Grey Enamel	B1	9.62	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.04
SB9001 Black Enamel	B1	9.07	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	5.69
SC2006 Red Primer	B1	9.8	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.15
SC8002 Grey	B2	9.82	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.17
SB6002 Blue Enamel	B2	9.25	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	5.81
SB8001 Grey Enamel	B2	9.62	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.04
SB9001 Black Enamel	B2	9.07	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	5.69
SC2006 Red Primer	B2	9.8	0.493600	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	6.15
SC8002 Grey	Pre-Paint B1	9.82	0.051650	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.65
SB6002 Blue Enamel	Pre-Paint B1	9.25	0.051650	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.61
SB8001 Grey Enamel	Pre-Paint B1	9.62	0.051650	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.63
SB9001 Black Enamel	Pre-Paint B1	9.07	0.051650	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.60
SC2006 Red Primer	Pre-Paint B1	9.8	0.051650	9.68	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.64
7GZ410 Grey	L7	13.15	0.250000	9.11	2.00%	2.00%	7.00%	0.00%	2.62	2.62	9.18	0.00
7GZ393 Grey Primer	L7	13.01	0.250000	9.11	4.00%	4.00%	16.00%	0.00%	5.19	5.19	20.76	0.00

Total State Potential Emissions

5.19

5.19

20.76

12.98

Note: The coatings in each process are mutually exclusive

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Brunner Engineering & Manufacturing
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-7549
Plt ID: 093-00010
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.65

14.5

Heat Input Capacity consists of one (1) 1.65 MMBtu/hr drying oven using a low NOx burner

Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	50.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.05	0.00	0.36	0.04	0.61

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Brunner Engineering & Manufacturing
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-7549
Plt ID: 093-00010
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

8.89

Potential Throughput
MMCF/yr

77.9

Facility	MMBtu/hr
Furnace (Press Area)	0.66
Main Furnace	6.6
Furnace (Shipping)	0.08
Furnace (Supervisor's Office)	0.065
Furnace (Office)	0.085
Furnace (Maintenance)	0.12
Furnace (Banding)	0.12
Water Heater (Office)	0.04
Water Heater (Washer)	1
Furnace (Crib)	0.12
Total	8.89

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.30	0.02	3.89	0.21	3.27

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).